San Diego County Water Authority

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September 30, 2011

Phil Isenberg Chair Delta Stewardship Council 980 Ninth Street, Suite 1500 Sacramento, California 95814

Re: Fifth Draft - Delta Plan

Dear Chairman Isenberg and Members of the Council:

The San Diego County Water Authority appreciates the opportunity to comment on the Fifth Staff Draft of the Delta Plan. The San Diego County Water Authority is a public agency serving the San Diego region as a wholesale supplier of water from the Colorado River and Northern California. The Water Authority's mission is to provide a safe and reliable supply of water to its 24 member agencies serving the San Diego region.

The Water Authority has the following concerns regarding the Fifth Staff Draft of the Delta Plan:

- 1. The draft plan does not provide a clear strategy for achieving the co-equal goals of water supply reliability and ecosystem restoration. The plan does not specify near-term or long-term actions to achieve the co-equal goals.
- 2. The draft plan does not clearly commit to identify what levels of water supply water agencies might expect in the future. With respect to water supply, there is a greater emphasis on flow criteria than on improving water supply reliability.
- 3. The draft plan must focus on the Delta. Emphasis on regulating local water management activities in regions hundreds of miles from the Delta will hamper local planning efforts, divert resources from resolving Delta issues, and does not contribute materially to achieving the co-equal goals. Local water management can best be accomplished through local efforts and decision-making.
- 4. The draft plan emphasizes flow criteria as the main strategy for improving ecosystem health, without providing for responses to other stressors, such as invasive species and waste discharges.

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County of San Diego

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The Water Authority strongly supported the 2009 legislative package that created the Delta Stewardship Council. The Water Authority still strongly supports the achievement of the co-equal goals. The Water Authority supports the Alternate Plan proposed by ACWA as a more productive approach to achieving the co-equal goals. The Water Authority cannot support the Delta Plan, as it is laid out in this Fifth Staff Draft.

Sincerely,

Maureen A. Stapleton General Manager